

**Final Environmental Assessment
For Demolishing Buildings 202 and 425
At Avon Park Air Force Range, Florida**



August 2005

**Prepared by the Environmental Flight,
Avon Park Air Force Range, Florida**

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ACRONYMS AND ABBREVIATIONS

ACC	Air Combat Command
ACM	Asbestos Containing Material
APAFR.....	Avon Park Air Force Range
APYA.....	Avon Park Youth Academy
ASOG.....	Air Support Operations Group
CEQ.....	Council of Environmental Quality
CFR.....	Code of Federal Regulations
CWA.....	Clean Water Act
DNL	day-night average sound level
dB.....	decibels
EA	environmental assessment
EIA.....	Environmental impact analysis process
EO	executive order
EPA.....	Environmental Protection Agency
FAC.....	Florida Administrative Code
FDEP.....	Florida Department of Environmental Protection
FONPA	finding of no practicable alternative
FONSI.....	finding of no significant impact
GIS	geographical information system
IAW.....	In Accordance With
INRMP	Integrated Natural Resources Management Plan
MS.....	Mean sea level
MWR.....	Morale, Welfare, and Recreation
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PCB	polychlorinated biphenyls
PM ₁₀	particle matter ten
ROI.....	Region of Influence
RPA.....	Registered Practicing Archeologist
SAFO	Secretary of the Air Force Order
SFWMD.....	South Florida Water Management District
SHPO	State Historic Preservation Office
TCLP.....	Toxic Characteristic Leaching Procedures
US	United States
USACE	United States Army Corp of Engineers
USAF	United States Air Force
USC.....	United States Code
USCB	United States Census Bureau

**Draft Environmental Assessment for
Demolishing Buildings 202 and 425
At Avon Park Air Force Range, Florida**

Proposed Action: Demolish Buildings 202 and 425 at Avon Park Air Force Range, Florida

Type of statement: Environmental Assessment

Cooperating agencies: None

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Abstract: The 18 Air Support Operations Group (ASOG) at Avon Park Air Force Range (APAFR) proposes to demolish Buildings 202 and 425. Both buildings are vacant and unusable in their current condition. Building 425 suffered water damage from a hurricane in 2004. Both buildings appear to meet the criteria for listing in the National Register of Historic Places and are under a programmatic agreement between the Florida State Historic Preservation Office and Avon Park Air Force Range. Both buildings have asbestos containing materials and lead based paint. The buildings would be removed with heavy equipment consisting of a backhoe/nibbler and haul trucks. The demolition material would be transported off site to a landfill that is approved for hazardous materials. Building 425 is funded for demolition and would be demolished during the summer of 2005. Building 202 is not funded for demolition and would be demolished at an undetermined date in the future.

FINDING OF NO SIGNIFICANT IMPACT AND FINDING OF NO PRATICABLE ALTERNATIVE

1.0 NAME OF PROPOSED ACTION

Demolish Buildings 202 and 425 at the Avon Park Air Force Range (APAFR), Florida.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

The U.S. Air Force proposes to demolish Buildings 202 and 425 at Avon Park Air Force Range, Florida... Removing the buildings would eliminate health and safety risks associated with these structurally unsound, hazardous-material-containing buildings currently located in a cantonment area subjected to foot traffic. An Environmental Assessment was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) (42 United States Code [USC] 4321-4347), the Council of Environmental Quality's (CEQ) 40 Code of Federal Regulations (CFR) 1500-1508 *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, and the Department of the Air Force's 32 CFR 32-989 *Environmental Impact Analysis Process*.

The Proposed Action would demolish and remove Buildings 425 and 202. Building 425 would be demolished and removed during the summer of 2005, while Building 202 would be demolished and removed at an undetermined date. The buildings would be removed with heavy equipment and in a manner that the demolished waste would be compacted and loaded onto haul trucks. The waste would then be covered on the haul trucks and transported off the installation to an approved landfill. Because there are asbestos containing materials (ACM) and potentially lead based paint in the buildings, the buildings would be sprayed with water mixed with wetting agents during the demolition in an effort to reduce the amount of ACM and potential lead paint dust caused by the demolition. Tests for the presence of lead based paint would be performed prior to demolition. If the lead exceeds a threshold level, the painted materials would either be removed separately prior to demolition or demolished with all the materials and handled and disposed of as a hazardous waste.

The No-Action Alternative retains both Building 202 and 425 with no renovation. The buildings would continue to degrade.

3.0 SUMMARY OF ENVIRONMENTAL CONSEQUENCES

The EA provides an analysis of potential environmental impacts to the region of influence for this proposal, which consists of the APAFR cantonment area. Twelve resource areas were evaluated in detail to identify potential environmental consequences of each alternative. The proposed demolition was found to have no significant impacts on: noise, hazardous materials and waste, air quality, soils, water resources, vegetation, cultural resources, safety, environmental justice, long-term productivity of the installation, irretrievable resources of any sort, or other land use plans for the area. This determination was made after consideration of cumulative and indirect impacts of the proposed action.

Noise: Noise levels created by haul trucks near Building 425 would be high enough that they could interfere with outdoor activities being conducted at the Avon Park Youth Academy. As a courtesy, the academy would be notified of the demolition dates prior to initiating demolition.

The no action alternative would cause no change in the noise levels in the area.

Hazardous Materials and Waste: The buildings were inspected for hazardous containing materials and equipment that would require removal prior to demolition. Fluorescent lighting with ballasts potentially containing polychlorinated biphenyls (PCBs) were found in Building 425, while cooling and refrigeration equipment with potential Freon were found in Building 202. The lights and ballasts would be removed prior to demolition. If present, Freon would also be removed when Building 202 would be demolished sometime in the future. The interior and exterior paint on both buildings is suspected of being lead based. A composite sample of various suspected lead contaminated portions of the buildings would be collected and tested before demolition begins. If the toxic characteristic leaching procedures (TCLP) test shows lead above a threshold level, then the building debris would be handled as hazardous waste and disposed of in an approved landfill. If the value is below threshold, the building debris will be handled as construction debris contaminated with lead and sent to an approved construction and demolition rated landfill.

The no action alternative would not work with hazardous materials or generate hazardous waste.

Air Quality: Polk County is in attainment for all National Ambient Air Quality Standards pollutants monitored under the Clean Air Act. Water and wetting agents would be used to minimize PM₁₀ emissions. Particulate emissions during demolition would be managed through wetting the site with water and wetting agents. Haul trucks would be covered to minimize dispersion of dust fibers during demolition material transport.

The no action alternative would have no impact on air quality.

Soils: Soils would be disturbed during demolition. After completing demolition, erosion would be controlled through leveling, compaction and seeding of the site to stabilize soils.

The no action alternative would have no impact on soils.

Water Resources: The proposed action would not impact aquifers or the water table.

The no action alternative would have no impact on water resources.

Vegetation: Lawn would be re-established after action completion and managed in a similar manner to surrounding areas.

The no action alternative would have no impact on vegetation.

Cultural Resources: The Proposed Action would adversely affect the historical integrity of Buildings 202 and 425. In accordance with the National Historic Preservation Act, APAFR conducted a Historical American Buildings Survey (HABS) at Level III Standards. The Florida State Historic Preservation Office (SHPO) concurred on the need for this level of survey and the sufficiency of the resulting data. As per SHPO's request, a registered, practicing archaeologist (RPA) would be present during the excavation portion of the demolition.

Under the no action alternative, the buildings would not be demolished. The buildings would remain vacant and continue to degrade. The historical integrity of the buildings would continue to decline as the buildings degrade. Due to their degrading condition, a HABS Level III survey was conducted.

Safety: Safety conditions would be improved through removal of two unsafe buildings in the cantonment area. During the demolition safety would be maintained through use of construction fence and other standard construction safety practices.

The no action alternative would have no impact on safety.

Environmental Justice: The population of the impacted census tract has a higher percentage of minority individuals than remainder of Polk County, the majority of which reside in the Correctional Institute and Avon Park Youth Academy. However, environmental impacts including safety, noise, and air quality would be managed such that impacts to these populations would be expected to be minimal. Impacting these populations is unavoidable given the location of the buildings proposed to be demolished.

The no action alternative would have no impact on Environmental Justice.

Relationship Between Short-Term Use and Long-Term Productivity: The buildings proposed for demolition are currently not in use and there is no foreseeable use for them in the future. No significant impact to long-term productivity is expected.

The no action alternative would have no impact on long-term productivity.

Irreversible and Irretrievable Commitment of Resources: Two structures potentially eligible for listing in the NRHP would be demolished under the proposed action. However, SHPO concurs that HABS documentation alleviates this impact. Fuels, lubricants, and human resources would be irretrievably committed to this effort. Overall, impacts are insignificant in nature.

The no action alternative would commit no additional resources.

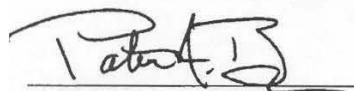
Compatibility With Other Land Use Plans: The proposed action does not conflict with any plans currently in place at APAFR.

The no action alternative would not conflict with any plans currently in place at APAFR

4.0 FINDING OF NO SIGNIFICANT IMPACT

Based on the analysis of this EA, no significant impact is anticipated with the Proposed Action or the Alternative Action. I conclude that removing Buildings 202 and 425 at Avon Park Air Force Range, Florida, as described under the Proposed Action, warrants a Finding of No Significant Impact (FONSI) and an environmental impact statement is not required.

Pursuant to Executive Order (EO) 11988 *Floodplain Management*, the authority delegated in Secretary of the Air Force Order (SAFO) 791.1, and taking the information contained in the attached environmental assessment into account, I find that there is no practicable alternative to demolishing Buildings 202 and 425, which are located within a 100 year floodplain. The Proposed Action includes all practicable measures to minimize harm to the floodplain environments.



PATRICK A. BURNS
Brigadier General, USAF
Director of Installations (A7)

31 Aug 05
Date

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1.0 PURPOSE AND NEED FOR ACTION

1.1 INTRODUCTION

The United States Air Force (Air Force), 18th Air Support Operations Group (ASOG), Operation Location Alpha, Civil Engineering (OL A/CE) at Avon Park Air Force Range (APAFR) proposes to demolish and remove Buildings 202 and 425.

This EA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) (42 United States Code [USC] 4321-4347), the Council of Environmental Quality's (CEQ) 40 Code of Federal Regulations (CFR) 1500-1508 *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, and the Department of the Air Force's 32 CFR 32-989 *Environmental Impact Analysis Process*.

Section 1.2 briefly describes the mission of APAFR and the history of the buildings, while Section 2.3 describes the purpose and need for the Proposed Action and No-Action Alternative.

1.2 Background

Avon Park Air Force Range (APAFR) is located in Polk and Highlands Counties in central Florida (Figure 1.2-1). The range complex covers approximately 106,073 acres and is about ten miles east of Avon Park and 15 miles northeast of Sebring, Florida. The major access roads serving the range are US Highway 27 and County Road 64.

APAFR is the largest bombing and gunnery range east of the Mississippi River. The mission of APAFR is to provide a training infrastructure that allows United States (US) air and ground forces to practice the latest combat training techniques and procedures safely, efficiently, and realistically, and to design training facilities that meet training needs. The 18th Air Support Operations Group (ASOG) at Pope Air Force Base, North Carolina, is responsible for the operation and maintenance of APAFR, which is assigned to the Air Combat Command (ACC).

The range is used for bombing practice by U.S. Air Force units and other services from throughout the southeastern United States.

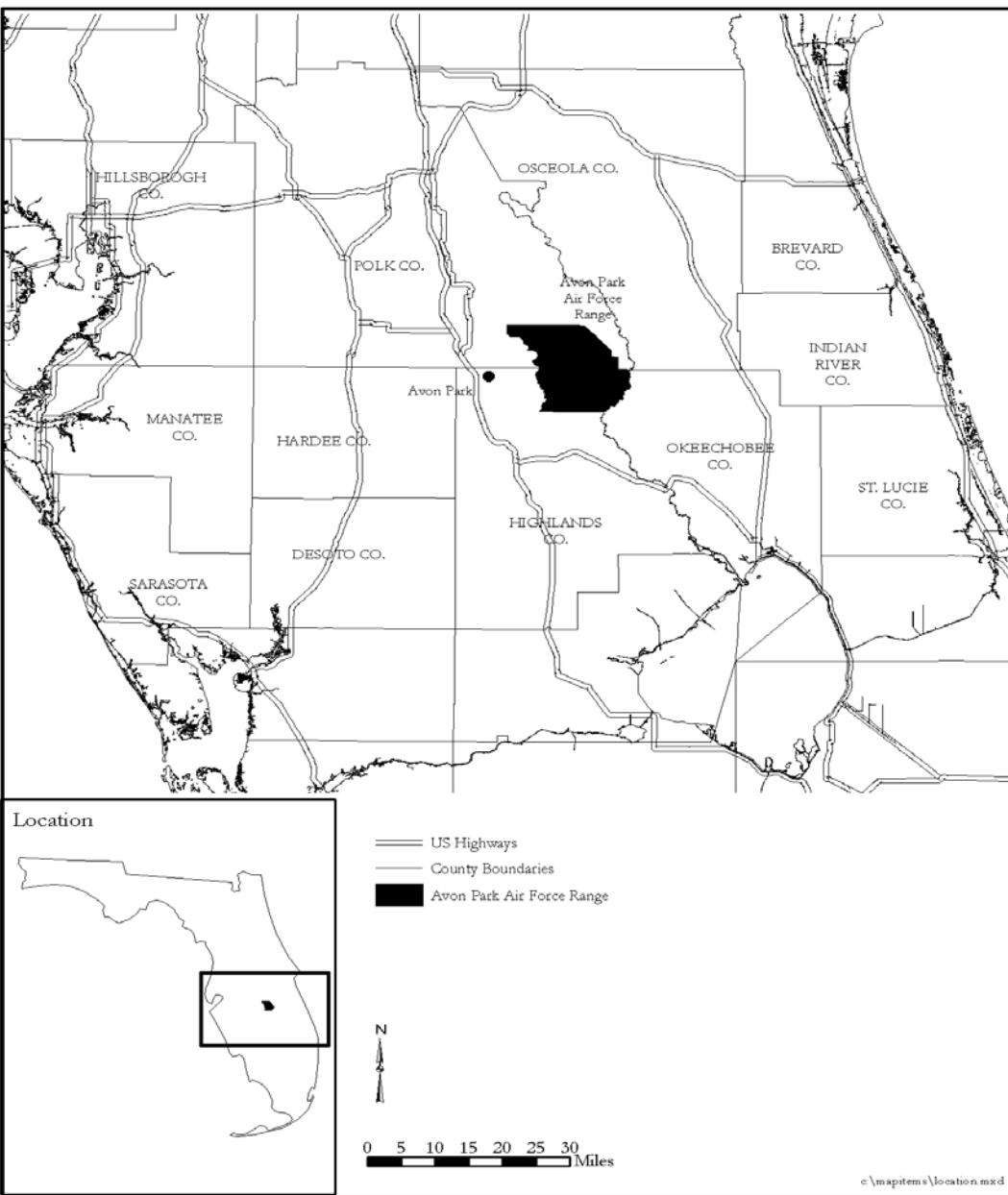


Figure 1.2-1. Avon Park Air Force Range's Location in Florida.

The buildings are located in T32S, R30E, S25, SESE, Tallahassee Principal Meridian, with a Building 202 having the UTM (NAD-83) location of E463180, N3059900 for Zone 17 South, Building 425 at E463450, N3059900. Building 202, of wood frame construction, was built in 1943 and served as a temporary nurse's quarters and mess (Figure 1.2-2). After WWII, Building 202 served as a non-commissioned officers club. Building 202 is a single story building, rectangular, and approximately 5,700 square feet in size. The foundation is concrete pilings with the building resting above the ground. Building 425 is a single-story, concrete-block, square building that is approximately



Figure 1.2-2 Building 202 at Avon Park Air Force Range, Florida.

2,690 square feet in size (Figure 1.2-3). The foundation is a concrete slab. Building 425 pre-dates the establishment of APAFR and was constructed in the 1920s. As part of APAFR, its function changed over the years, serving as an administration office for the post engineer during WWII, then after WWII housing security personnel, and finally ending its use as a credit union and arts and crafts center. Both buildings became vacant in 1993 when the active duty military unit transferred from APAFR with Morale, Welfare, and Recreation (MWR) activities being no longer needed at the installation.

1.3 Purpose and Need

Buildings 202 and 425 are located in the western portion of the Cantonment Area of APAFR. They are currently vacant, no longer serve a purpose, and are structurally unsound. The need for demolishing the buildings is primarily aesthetics. Building 202 is the first visible Air Force building after entering the installation through the Main Gate. Building 425 is amongst other functional buildings and is highly visible because it is the building closest to the installation's main road, South Boulevard. Both buildings are visibly degrading and not aesthetically pleasing. Health and safety issues are also a concern as both buildings are in the cantonment area and are subject to pedestrian traffic.



Figure 1.2-3 Building 425 at Avon Park Air Force Range, Florida.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Proposed Action

The Proposed Action would demolish both buildings by using heavy equipment that would consist of a backhoe equipped with a nibbler. A backhoe with a nibbler is a vehicle with a hydraulic armature that supports a bucket and two protruding jaws called a nibbler. The demolition would collapse the buildings internally by the backhoe collapsing the roof from well inside the building so that the debris material would fall towards the center of the building. As the backhoe would collapse the building, the jaws of the nibbler would crush and demolish the building material. The bucket would then load the materials into haul trucks. The haul truck beds would be covered after being filled. The haul trucks would transport the materials off the installation to an approved landfill. The benefit of using a nibbler would be that the demolished materials would be compacted and therefore would require fewer trips to the landfill by the haul trucks and there would be less space required in the landfill.

There is a buried septic tank that served Building 425. Earth would be excavated to determine if the tank has sewage. If so, the sewage would be pumped and cleaned from the tank and transported off the installation by a certified septic transporter. The septic tank would be collapsed in place and then filled with local fill dirt. The sewer line leading to the leach field would be capped.

Both buildings have asbestos containing materials (ACMs) (USAF 1994) and lead based paint (USAF 2003a). To comply with the potential air emissions of hazardous materials, coordination with the State of Florida Department of Environmental Protection would be required to include the ten days prior notice of any demolition using the appropriate state forms as required by Florida Administrative Code (FAC) 62-257.301. Also, to minimize the potentially hazardous dust created from demolishing these materials, pressurized water with a wetting agent would be sprayed on the buildings and materials during the demolition. Wetting follows the guidance as described in the Environmental Protection Agency's (*EPA*) *Asbestos National Emissions Standards for Hazardous Air Pollutants Adequately Wet Guidance*. The haul-truck beds would be covered to prevent the demolished material from blowing off the haul trucks as they transported the demolished material off the installation.

Fluorescent lights and ballasts containing polychlorinated biphenyls (PCBs) are the only known hazardous containing equipment that requires removal prior to the demolition. This equipment would be removed from the buildings prior to demolition and properly disposed of or recycled and performed by properly certified contractors.

While the methodology would encourage the demolished material to fall towards the center of the buildings, there is some potential for debris to land outside of their immediate perimeter. Therefore, a temporary fence would be placed around the buildings to limit access by personnel. The safety fence would be placed far enough away from the

buildings to encompass flying debris and would allow the backhoe and haul trucks access to the buildings. The safety fence would be established prior to demolition.

No material from either building would be removed from the building prior to demolition based on salvage value. A survey conducted in April 2005 determined that there is no cultural hardware (door knobs, hinges, mirrors, etc...) present.

Prior to when the equipment would demolish the buildings, the electrical utilities would be checked to ensure that they are disconnected. The water lines would be shut off. Both buildings were heated by propane tanks. These tanks were removed. Approximately a half dozen oak and palm trees each are adjacent to and overhanging Building 202. They would be removed to allow access by the demolition equipment. The water line would be capped at the demolition site.

The parking lots to the west of the respective buildings would provide locations for the loading and off loading of heavy equipment (Figure 2.1-1). The haul trucks would be able to occupy the parking lots and adjacent land while being filled by the backhoe. The haul trucks would enter and exit the installation through the Main Gate, approximately $\frac{1}{2}$ mile to the west. All equipment and haul trucks would access the demolition sites via South Boulevard.

Building 425 would be demolished during the summer of 2005 with the earliest start date being 15 August. Demolition would occur between the hours of 7 a.m. through 5 p.m., Monday through Friday. Work during the weekend would be allowed. The building is estimated to be demolished and hauled away in one day, while the concrete slab foundation and collapsing the buried septic tank is anticipated to take an additional day, thus taking two days to remove the entire building.

Building 202 does not have a future date to be demolished. The building, including the concrete-foundation pilings, is estimated to take two days to demolish. As with Building 425, the water line would be capped at the demolition site.

Demolishing both buildings and collapsing the septic tank would result in disturbed ground and would require bulldozing to level and compact the soil. After leveling and compacting, lawn-grass seed would be spread to stabilize the soils.

2.2 The No-Action Alternative

The No-Action Alternative retains Buildings 202 and 425. They remain vacant, are not repaired or maintained, and continue to deteriorate. Building 425 would be completely boarded up to deny all access. Building 202 is currently boarded up.

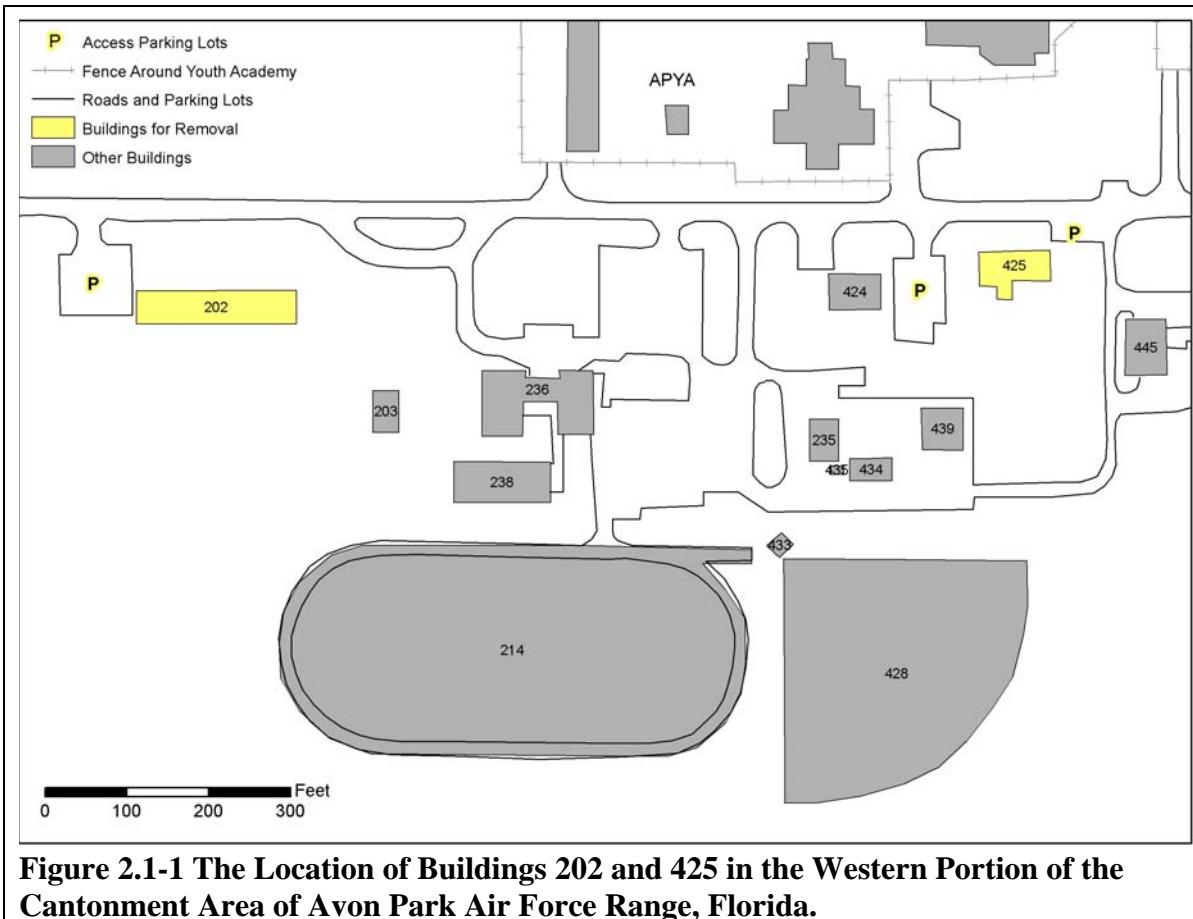


Figure 2.1-1 The Location of Buildings 202 and 425 in the Western Portion of the Cantonment Area of Avon Park Air Force Range, Florida.

2.3 The Repair Alternative Not Pursued

Repairing Buildings 425 and 202 was not considered as an alternative. This conclusion was based on factors to include that APAFR has no demand for office or storage space in or near the locations of the buildings, the buildings have ACMs that would have to be removed during renovation, and the repair costs exceed the replacement costs of the buildings. Air Force Instruction (AFI) 32-1032 *Planning and Programming Appropriated Funded Maintenance, Repair, and Construction Projects* states that repair cannot commence if replacement is less expensive unless working with buildings listed on the national or a state historic register. The buildings are considered potential for the national register, but currently are not listed. The cumulative factors of a lack of demand, removing ACMs, and high repair costs resulted in not pursuing a repair alternative.

2.4 Other Regulatory and Permit Requirements

The contractor conducting the demolition will be responsible for submitting a written notice of intent (NOI) to the Florida Department of Environmental Protection prior to demolition. The NOI is required to be in compliance with the regulations of the National Emissions Standards for Hazardous Air Pollutants under the Clean Air Act.

The contractor will be accredited for removing hazardous materials for recycling or proper disposal.

Because the surface area of disturbed ground would be less than one acre, a State of Florida Department of Environmental Protection's *Generic Permit for Stormwater Discharge from Large and Small Construction Activities* is not required prior to demolishing the buildings.

2.5 Issues Considered But Not Carried Forward in the Analysis

APAFR has many threatened and endangered animal and plants species that typically are considered in NEPA documentation. None of the species are in the areas of the Proposed Action and No-Action Alternative and therefore were not addressed in this EA.

3.0 AFFECTED ENVIRONMENT

3.1 Noise

Noise is defined as unwanted or annoying sound that interferes with or disrupts normal human activities. Noise therefore must have a point of origin and a human receptor. Noise sources in the vicinity of Buildings 202 and 425 include vehicle traffic, lawn mowers, and distant aircraft. Aircraft are restricted from low-level flights over the western portion of the Cantonment Area. Noise receptors in the vicinity of Buildings 202 and 425 include Air Force employees and contractors, Avon Park Youth Academy students and staff, and Avon Park Correctional Institution staff residences.

3.2 Hazardous Materials and Waste

The demolition of a building requires that a walk through of the building be conducted first to determine if any hazardous materials need to be removed from the building prior to demolition. The walk through also verifies that asbestos containing materials (ACMs) in previous surveys are indeed present. Current records show that there were no removal actions in the past. A walk through the buildings on 22 July 2005 found the following in Building 425:

- Fluorescent lights and ballasts containing polychlorinated biphenyls (PCBs), or suspected of containing PCBs.
- Suspected lead based paint surfaces on the interior and exterior of the building.
- The following ACM: vinyl composite floor tile 2,503 square feet and roof shingles 2,900 square feet.

The walk through Building 202 found the following:

- Eight air conditioning window units, three ice makers, and one walk-in cooler – all appliances that may contain Freon.
- Suspected lead based paint surfaces on the interior and exterior of the building.
- ACMs containing material at greater than 1%: wall sheetrock 6,528 square feet, ceiling sheetrock 2,694 square feet, vinyl composite floor tile 4,130 square feet, piping wrap 288 square feet, and roof shingles 5,690 square feet.

The work requires heavy machinery and haul trucks. Therefore petroleum and lubricants that are hazardous materials would be on site in small quantities. These vehicles typically have fuel tanks between 100 and 200 gallons. It is anticipated that no refueling of vehicles would occur at the work site due to the short duration of the project. No hazardous materials would be used for the building's demolition. The buildings have parking lots associated with them with no storm sewers. Rain runoff has been allowed

over the years to flow into the grassy areas surrounding the parking lots. No visible staining of the grass was observed indicating no serious environmental problems.

3.3 Air Quality

Avon Park Air Force Range is in an attainment area for all pollutants of air quality.

3.4 Soils

The *Soil Survey of Polk County, Florida* (USDA 1990) maps Buildings 202 and 425 as occupying Smyrna and Myakka fine sands. The soil composition has been altered from past building construction so that much of the soil profile has changed. The soil survey describes these soils as poor sites for building construction due to a high seasonal water table and soil wetness. A drainage system in the Cantonment Area has been developed to lower the water table and reduce soil wetness. The drainage system includes a series of ditches that ultimately delivers water into a major canal called the Rim Canal. The Rim Canal empties into Arbuckle Creek.

3.5 Water Resources

Aquifers and Water Table: There are three fresh-water aquifers at APAFR. The deepest is the upper Floridan Aquifer. The upper Floridan Aquifer is 50 feet to 400 feet deep with a thickness of 900 feet to 1,200 feet (Barr 1992). Water recharge for this aquifer is from large sinkhole lakes that have breached confining clay layers above the upper Floridan Aquifer. The upper Floridan Aquifer meets the Florida Department of Environmental Protection (FDEP) drinking-water standards and is the source of drinking water at APAFR. Above the upper Floridan Aquifer is the Intermediate Aquifer. The Intermediate Aquifer is separated from upper Floridan by a confining clay layer. The Intermediate Aquifer is approximately 200 feet thick at APAFR. Water recharge is from sinkholes that have breached the confining clay layers above the Intermediate Aquifer. Water quality is acceptable for drinking water. Above the Intermediate Aquifer is the Surficial Aquifer. The Surficial Aquifer is separated from the Intermediate Aquifer by a clay confining layer. The Surficial Aquifer is 50 feet to 200 feet thick. The Surficial Aquifer is recharged by the water table above it.

APAFR's potable water supply is from deep wells that acquire water from the Floridan Aquifer. The wells are located on Avon Park Correctional Institution's property near the western portion of the Cantonment Area.

The water table fluctuates seasonally. The water table is highest during the rainy season (June-September) and is within 12 inches of the ground surface for the soil type. The Cantonment Area is artificially drained, thus resulting in a lower water table.

Floodplains and Wetlands: Both buildings are within the 100 year floodplain. The water bodies creating the floodplain are Arbuckle Creek and Arbuckle Lake located to the west. The buildings are not located in wetlands.

3.6 Vegetation

Both buildings are on landscaped grounds. The lawn is a bahia-grass lawn. Building 425 has two palm trees adjacent to it, while Building 202 is lined with half a dozen live oaks, palms, and many shrubs. Some of the live oaks and palms reach over the roof of Building 202.

3.7 Cultural Resources

Buildings 202 and 425 are considered potentially eligible for the National Register of Historic Places (NRHP) as determined by a cultural resources inventory and assessment (HQ ACC 1997). Due to the degrading condition of these buildings and the potential to demolish them, APAFR is conducting a Historical American Buildings Survey (HABS) at Level III Standards in an effort to permanently record their historical setting and characteristics. This level of documentation was concurred during consultation with the Florida State Historic Preservation Office (SHPO), see Appendix A.

3.8 Safety

Both buildings are vacant and are not safe to enter due to collapsing floors and ceilings. Both buildings are reaching a threshold to where their deterioration will accelerate and their structural soundness will be compromised. Both buildings are locked with Building 202 having the entrances boarded up as well. Building 202 is farther from the main entrance road and receives very little vehicle traffic. Building 425 is close to the main entrance road and has frequent traffic pass by it. The parking lot north and east of Building 425 is occupied daily by commuter vehicles working at APYA. Both buildings are subject to foot traffic near them.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Noise

Proposed Action: The Proposed Action would use heavy equipment to demolish the buildings. The noise generated by the equipment would not exceed levels that would be considered annoying to the surrounding human receptors except for the noise that would be generated from haul truck traffic on South Boulevard near Building 425. The haul trucks would occasionally produce noise levels considered annoying for human receptors on the property of Avon Park Youth Academy (APYA) if APYA people would be outside. APYA should be notified of the date for demolition as a courtesy if demolition is pursued.

No-Action Alternative: The No-Action Alternative would not appreciably add to the noise environment.

4.2 Hazardous Materials and Waste

Proposed Action:

Prior to demolition, the following will be performed in Building 425:

- Fluorescent lights and ballasts removed.
- Painted surfaces sampled and characterized to determine if they exceed toxic characteristic leaching procedure (TCLP) levels. If they exceed TCLP for lead, a decision will need to be made whether to handle the entire structure as a hazardous waste or to remove just the lead based paint items. If the decision is to remove the painted items, they will be removed, bagged, and transported to an approved landfill.
- Wetting the building prior to and during demolition to minimize the dust of ACMs. Also, if the painted surfaces do contain lead, but are below TCLP levels, wetting will suffice to minimize the dust.
- Straw bales and booms should be placed across drainage swales on the parking lots to keep asbestos fibers from reaching the surface waters of the State of Florida. At the end of the demolition, the bales and booms would be hauled to the landfill for disposal.
- In accordance with (IAW) APAFRs' current Spill Prevention, Control, Countermeasure Plan (URS 2004), a spill kit would be maintained at the site for quick response to any releases or hydraulic line breaks. Any spills that would occur would be contained and the absorbent material placed in drums for disposal.

Prior to demolition, the following will be performed in Building 202:

- The painted surfaces, ACMs, straw bales and booms, and spill kit handled in the same manner as with Building 425.
- All cooling appliances tested for Freon and if present, Freon would be removed.

The debris would be hauled to a certified landfill for disposal of ACM and possibly lead based paint. The large metal appliances and metal sinks in Building 202 would be separated and transported separately to the landfill because these metal materials have recycling value. The hazardous waste manager for the Air Force would be responsible to ensure that the materials are transported properly by a qualified, designated disposal contractor.

The Proposed Action would only use minor amounts of hazardous material and generate very little hazardous waste. The only impact would be consuming fossil fuels to power the equipment and the occupation of space at the designated disposal landfill.

If the paint requires removal, a certified contractor would be employed to remove the paint. This would potentially increase the number of days to demolish each building by four days each.

No-Action Alternative: The No-Action Alternative would not work with hazardous materials or generate hazardous waste. No appliances would be recycled.

4.3 Air Quality

Proposed Action: Under the Proposed Action, there would be minimal impact to air quality in the local area. Minimal engine exhaust emissions would be expected due to the short duration of the project. There would be fugitive dust (PM_{10}) from the building demolition to include some ACM. The project would wet the sites with water and wetting agencies as the demolition occurs; hence minimal particulates would be in the air. The haul trucks would be covered to prevent dispersion of the dust fibers on the highways. The landfill would be notified in advance that ACM would be disposed of at that facility and the day it would arrive. APAFR recommends that the landfill take precautions to ensure that their employees would be upwind of the haul trucks when the material would be dumped. The landfill equipment operator should wear a respirator mask to prevent inhalation as the waste is compacted and covered.

No-Action Alternative: The No-Action Alternative would not add contaminates to the air nor reduce air quality in any manner.

4.4 Soils

Proposed Action: The Proposed Action would disturb the soil on the site where the buildings are removed and would result in a short term potential for water and wind

erosion. The potential would be low because the disturbed area is not on a slope. Leveling and compacting the soil after the demolition would further reduce the potential for erosion. Seeding the site would stabilize the soils and prevent erosion long term.

No-Action Alternative: The No-Action Alternative would not disturb the soils.

4.5 Water Resources

Proposed Action: The Proposed Action would not impact the aquifers or the water table. Removing the foundation of Building 425 would excavate below the soil surface, but would not disrupt the water table because the site is artificially drained and keeps the water table lower than listed (USDA 1990) for the respective soil types. The buildings would be removed from the floodplain.

No-Action Alternative: The No-Action Alternative would not impact the aquifers or the water table. The buildings would remain in the floodplain.

4.6 Vegetation

Proposed Action: The Proposed Action would disturb the lawn adjacent to the buildings and leaves bare ground where the buildings would be removed. Approximately a half a dozen of each of the palm and oak trees would be removed in order to access Buildings 202 with heavy equipment. The lawn would be reestablished from seeding and filling in from the adjacent, undisturbed lawn. The tree removal around Building 202 would result in more direct sunlight on the ground, thus encouraging a thicker lawn. Weeds may come in initially on the bare ground, but normal lawn maintenance activities of mowing and chemically treating broad leaf weeds would reduce them and favor a grass-lawn landscape.

No-Action Alternative: The No-Action Alternative would not disturb the vegetation.

4.7 Cultural Resources

Proposed Action: The Florida State Historic Preservation Officer (SHPO) determined that the proposed demolition of Buildings 202 and 425 would have an adverse effect (Appendix A). Both buildings were previously determined to be potentially eligible for listing in the NRHP. The Florida SHPO determined that completion of Historic American Buildings Survey (HABS) Level III documentation for both buildings would be sufficient to mitigate the adverse effect. In March, 2005, large format photographs were taken of the exteriors and interiors of both buildings, as well as measured drawings of their interiors. On August 4, 2005, the Florida SHPO determined that the document package provided was complete and sufficient in accordance with HABS Level III standards.

Another requirement of the Florida SHPO was that the ground disturbing activities would be monitored by an on-site archaeologist. The monitoring archaeologist would determine

if significant archaeological deposits would be disturbed by the project. If significant archaeological deposits are encountered, the archaeologist will coordinate with the Florida SHPO to determine appropriate actions to avoid, minimize, or mitigate adverse impacts to historic properties listed, or eligible for listing in the NRHP. The archaeologist would be empowered to direct the construction activities away from potentially significant archaeological features or artifacts. These features or artifacts would be recorded and recovered in a professional manner. The resultant monitoring report would be forwarded to the Florida SHPO for review and comment. Ronald Grayson, (Register Practicing Archaeologist) RPA, Cultural Resources Program Manager for APAFR, will perform the archaeological monitoring during ground disturbing activities.

No-Action Alternative: The No-Action Alternative would have no immediate effect to historic properties. The No-Action Alternative would adversely affect the two potentially historic buildings long term because it would not repair the buildings and they would continue to degrade. Because the buildings are compromised and are reaching a threshold where their decomposition will greatly accelerate, a HABS III documentation was conducted.

4.8 Safety

Proposed Action: The electrical power and water would be shut off prior to demolition, thus eliminating safety hazards. Both buildings were serviced with propane, but the propane tanks have been removed. The temporary fencing would create a buffer that would avoid interaction between people and potential flying debris. The parking lot located adjacent and northeast of Building 425 could not be used during the demolition and therefore the people using this parking lot would have to be temporarily relocated to another parking lot. The other parking lots that serve the buildings would be closed during the demolition. Traffic would be mildly disrupted with haul trucks entering and exiting the demolition sites. Traffic cones and signs would be placed on South Boulevard warning vehicle drivers and pedestrians of haul truck traffic. The proposed action would improve safety by removing the structurally unsafe buildings.

No-Action Alternative: The No-Action Alternative would have no safety concerns associated with demolition. The buildings would remain standing and would continue to present a structural safety hazard for people entering them due to weak floors and ceilings. The buildings could conceivably remain standing for several more years despite their materials deteriorating. The deteriorated materials could present a risk to other buildings by creating flying debris if subjected to high winds associated with hurricanes.

4.9 Environmental Justice

Proposed Action: Environmental justice was established by Executive Order 12898 (1994) in an effort to prevent federal activities from deliberately excluding or subjecting minority and low-income populations to situations that adversely affect human health or the environment. Section 2-2 reads “Each Federal agency shall conduct its programs,

policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect on excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin.” Assessing potential impacts that may involve environmental justice entails determining the Region of Influence (ROI) that the proposed action and alternatives encompass and then determining where, if any, distinctively higher populations of minority or low-income people occur within the ROI when compared to surrounding populations of people (USAF 1997). The ROI for the Proposed Action would include all people in the Cantonment Area that can hear the demolition noise, or that would use or require services that go through the front gate where the haul trucks would be transporting demolition material. Census Tract 0157 contains minority populations being 18% to 63% higher, depending on ethnicity, than the minority averages in Polk County as a whole (USCB 2000). The tract encompasses the northwest quarter of APAFR as well as property off the Air Force installation to the north and west. The greatest concentration of the population of this tract is found at the Avon Park Correctional Institution and the Avon Park Youth Academy. While these populations are identified, the Proposed Action could not possibly avoid potential impacts to these populations due to the static location of the buildings that would be demolished. This EA identified noise as having a potential for impact. Again, coordinating with the Avon Park Youth Academy by giving advanced notice of the demolition dates would help the academy plan for the potential noise. Census Tract 0157 does not contain low-income populations.

No Action Alternative: The No-Action Alternative does not impact minorities or low-income populations.

4.10 Cumulative Impacts

Cumulative impacts assesses the Proposed and No-Action Alternatives in the context of past, present, and foreseeable future activities when viewed as a whole.

Proposed Action: The Proposed Action would leave the western portion of the Cantonment Area more aesthetically pleasing by removing the two vacant buildings. One building would be removed within a year, the second at an undetermined date. The area would more open with both of the buildings removed. Landscape upkeep would be easier with the buildings removed. The two buildings that were potentially eligible for listing in the NRHP would no longer present.

No-Action Alternative: The No-Action Alternative would leave the western portion of the Cantonment Area less aesthetically pleasing by retaining the two vacant buildings. In the near future, the buildings would still contribute to the historical setting. Long term, the buildings would eventually fall apart, lose their historical integrity, and not contribute to the historical setting.

4.11 Direct and Indirect Effects

Proposed Action: Direct effects of the Proposed Action would result in removing the buildings and adding lawn to the landscape. Short term direct effects would include increased noise, mild disruptions in traffic and parking patterns, and reseeding of the lawn. Indirect effects would include a short term potential for weeds to invade the demolition sites.

No-Action Alternative: The direct effect of the No-Action Alternative would retain the buildings in an aesthetically unpleasing condition. Indirectly, as these buildings would continue to degrade, they would increasingly adversely affect the general appearance of the western portion of the Cantonment Area as a whole.

4.12 Relationship Between Short Term Use and Long Term Productivity

Proposed Action: The buildings are currently not in use. After being demolished, there would no loss of productivity for the long term.

No-Action Alternative: The buildings are currently not in use and there would be no loss in productivity for the long term by leaving them intact.

4.13 Irreversible and Irretrievable Commitment of Resources

Proposed Action: Two potentially eligible buildings for listing in the NRHP would be removed from the landscape and could not be replaced. The HABS documentation has recorded the information on the buildings so that it can be referenced and retrieved in the future. The equipment, fuels, and time committed by human resources that would demolish the buildings could not be replaced.

No-Action Alternative: The No-Action Alternative would leave the buildings intact and would not maintain them. Decay would eventually lead to an irreversible and irretrievable loss of potentially historic resources. The completed HABS documentation has the same effected as with the Proposed Action. Equipment, fuels, and human resources would not be committed.

4.14 Compatibility with Other Land Use Plans

The Proposed Action and No-Action Alternative would not conflict with APAFR Integrated Natural Resource Management Plan (USAF 1997). APAFR does not have any other plans in place.

5.0 LIST OF PREPARERS

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Years of Experience: 26

Ronald I. Grayson
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M.A., Florida State University,
Tallahassee, Florida, 2004
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Margaret Margosian
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B.L.A., Landscape Architecture,
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Tod Zechiel
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M. Ag., Range Science, Texas A&M
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6.0 AGENCIES AND PUBLICS CONTACTED

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Director and State Historic Preservation Officer
Division of Historic Resources
Florida Department of State
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Mr. Pete Zeegers
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Sebring, Florida 33870

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Lakeland, Florida 33802

7.0 LITERATURE CITED

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APPENDIX A

RECORD OF CONSULTATION WITH REGULATORY AGENCIES

200
13 December 2004

MEMORANDUM Dr. Janet Snyder Matthews, Director
Division of Historical Resources
Review and Compliance Section
R.A. Gray Building, 4th Floor
500 S. Bronough Street
Tallahassee FL 32399-0250

FROM: 18 ASOG, DET 1/CC
8707 N. Golf Course Avenue
MacDill AFB FL 33621-5321

SUBJECT: Undertakings Affecting Buildings 202 and 425, Avon Park Air Force Range

1. The US Air Force proposes to demolish Buildings 202 and 425 at Avon Park Air Force Range (APAFR), Polk and Highlands Counties, Florida. Building 202 has already undergone an initial Section 106 consultation with your office by APAFR's providing minimum documentation on 3 July 2003. Your office responded in a letter dated 4 October 2003 stating that Building 202 appears to meet the criteria for listing in the National Register and that APAFR's proposed demolition had an adverse affect on the building. APAFR has not supplied you minimum documentation for Building 425 in the past and is now doing so in this letter and in the enclosures.
2. Building 202, of wood-frame construction, was built in 1943 and served as temporary nurse's quarters and mess and later as a non-commissioned officers club. Building 425 pre-dates the establishment of the Range and was constructed in the 1920s. Its function changed over the years, serving as administration and the post engineer's office and finally ending its use as a credit union and arts and crafts center in the early 1990s. Both buildings became vacant in 1993 when facility-use requirements by the Air Force decreased.
3. Neither building has potential for reoccupancy by the Air Force. Several factors determine this low potential. First, both buildings would require extensive repair and replacement of materials to include asbestos-containing materials that are currently compromised. Extensive repair is especially applicable to Building 425 because it incurred water damage from the 2004 hurricanes. Second, APAFR has sufficient buildings to accommodate personnel now and in the foreseeable future. It would be difficult to justify reoccupying these buildings. Third, no third party has expressed an interest to maintain or relocate the buildings.

Mailed 12/16

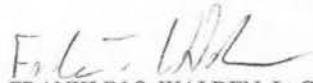
4. The Air Force examined the facilities, has no further use for them, and proposes to demolish both to remove the safety hazards. Both buildings are shown on the original real-property list for the range as temporary mobilization facilities, but they are considered eligible for listing on the National Register for Section 106 compliance, per our 2000 Programmatic Agreement with your office.
5. Per 36 CFR 800.5(a)(1), we determine that demolition of these two facilities will create an adverse effect and propose that Historic American Buildings Survey documentation, Level III, be performed to mitigate this adverse effect. We request your concurrence with this proposal.
6. The following is the minimum documentation for Building 425 Credit Union/Arts and Crafts.
 - a. **Division Involvement** - This is a federally owned building located on federally owned property. Section 106 of the National Historic Preservation Act prompts review of our actions by your office.
 - b. **Project Description** - The project involves demolition of Building 425 with all materials taken off the installation. The building is known to contain asbestos-containing materials and lead-based paint. Demolition and removal of these materials will follow standard safety and disposal procedures.
 - c. **Project Location and Maps** – Building 425 is in the cantonment area of APAFR. The legal location is T32S, R30E, S25, SESE, and a UTM (WGS-84) location of E463450 N3059900 for Zone 17 South. Attachment 1 is the site map that shows the dimensions of the building. Attachment 2 is a photocopy of a USGS 7.5 quad map of the project area. Attachment 3 is an aerial photograph of the general area showing the location of Building 425. The total acreage of the project site is less than 0.2 acres.
 - d. **Photographs** – Digital photographs of the exterior of Building 425 were taken and are on the enclosed diskette labeled Attachment 4. Due to compromised asbestos materials inside the building, no interior photos were taken.
 - e. **Description of the Project Area** – Building 425 is located in the cantonment area. A lawn surrounds the building. The project area is the building itself and the adjacent lawn. There are two parking lots near Building 425. The parking lots may be used for staging equipment used in demolishing the building.
 - f. **Description of Buildings and Structures** – Building 425 was reviewed by the *Avon Park Air Force Range Cultural Resources Inventory and Assessment, June 1997*. A description of this building from this report is recorded in Attachment 5. The building occupies approximately 2,690 square feet.
 - g. **Recorded Archaeological Sites or Historic Buildings/Structures** – Building 425 has been identified as potentially eligible for listing as an historic structure as per the Programmatic Agreement between the United States Air Force and the Florida State Historic Preservation Office. The Florida Master Site file for the project is BLDG -00425.

Building 425 was established prior to 1939 when the War Department purchased the property that was later to become the bombing range. Evidence for this is revealed in *A.F.A. Basic Information for Master Planning Purposes, Avon Park Army Airfield, Avon Park, Florida, 7 February 1947*. This document shows the property where Building 425 is located as being part of 2,744 acres owned by H.E. Godwin, and, in the building inventory, Building 425 is shown as being local.

An APAFR structural report in 1985 notes that oral history dates the building to the 1920's as a farm house. An addition of concrete block was made (date unknown) on the west side of the house for 1,145 square feet which, at the time of the report, housed a security forces office. An addition of plywood and vinyl siding was made (date unknown) on the south side of the house for 235 square feet to house an emergency generator. The original building housed a credit union at the time of the report. In 1986 the security forces moved out and an arts and crafts center moved in. The building was abandoned in 1993.

While there are several other buildings in the immediate area, these buildings were not identified in the cultural resources inventory and assessment as being potentially eligible for listing.

7. If you have any questions, please contact Tod Zechiel of my staff at (863) 452-4119, ext 328, or by e-mail at Tod.Zechiel@avonpark.macdill.af.mil.



FRANKLIN S. WALDEN, Lt Col, USAF
Commander

Attachments:

1. Site map
2. USGS map (photocopy)
3. Aerial Photograph
4. Diskette
5. Historical Structure Form Florida Site File



FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
Secretary of State
DIVISION OF HISTORICAL RESOURCES

Lt Col Franklin S. Walden
Department of the Air Force
18th Air Support Operations Group, DET 1/CC
8707 North Golf Course Avenue
MacDill Air Force Base, Florida 33621-5321

January 26, 2005

RE: DHR Project File Number: 2004-13285
Received by DHR December 20, 2004
Proposed Demolition of Buildings 202 and 425
Avon Park Air Force Range, Polk County

Dear Col Walden:

Our office received and reviewed the above referenced projects in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended and *36 CFR Part 800: Protection of Historic Properties*. The State Historic Preservation Officer is to advise Federal agencies as they identify historic properties (listed or eligible for listing in the *National Register of Historic Places*), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

We have reviewed the justification for the demolishing of the buildings and concur with your findings. In order to mitigate the adverse effect, the Department of the Air Force will document the buildings according to Historic American Buildings Survey (HABS) Level III Standards and requirements for the State Archives. Archival copies of the original measured drawings for the buildings if they can be located, should accompany the HABS documentation.

In addition, it is our recommendation that a archaeologist be on-site to monitor all subsurface disturbance activities. The purpose of the monitoring is to determine if significant archaeological deposits would be disturbed by this project and to assist this office in determining measures that must be taken to avoid, minimize, or mitigate adverse impacts to historic properties listed, or eligible for listing in the *National Register of Historic Places*. Should potential significant cultural features or artifacts be encountered, the archaeologist doing the monitoring should be empowered to direct the construction activities to shift away from such features or artifacts. This discretionary power would enable the monitor to contact this office or proceed to recover the cultural material and record cultural features in a professional manner and then project activities could continue. The resultant monitoring report for the project should be forwarded to this office for review and comment.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

<input type="checkbox"/> Director's Office (850) 245-6300 • FAX: 245-6436	<input type="checkbox"/> Archaeological Research (850) 245-6444 • FAX: 245-6436	<input type="checkbox"/> Historic Preservation (850) 245-6333 • FAX: 245-6437	<input type="checkbox"/> Historical Museums (850) 245-6400 • FAX: 245-6433
<input type="checkbox"/> Southeast Regional Office (954) 467-4990 • FAX: 467-4991	<input type="checkbox"/> Northeast Regional Office (904) 825-5045 • FAX: 825-5044	<input type="checkbox"/> Central Florida Regional Office (813) 272-3843 • FAX: 272-2340	

Col Walden
January 26, 2005
Page 2

Therefore, it is the opinion of this office that the HABS documentation and archaeological monitoring will serve as adequate mitigation for the demolition of Buildings 202 and 425.

If you have any questions concerning our comments, please contact Scott Edwards, Historic Preservationist, by electronic mail sedwards@dos.state.fl.us, or at 850-245-6333 or 800-847-7278.

Sincerely,

Laura A. Kanninen, Deputy SHPO
for
Frederick Gaske, Director, and
State Historic Preservation Officer



550 East 15th Street

Plano, Texas 75074-5708

ph: 972.423.5480 fax: 972.422.2736

WWW.GEO-MARINE.COM

May 24, 2005

Ronald Grayson
18 ASOG Det 1, OL A/CEVN
29 South Blvd
Avon Park AFR, FL 33825

Dear Mr. Grayson:

Historic American Buildings Survey photography has been completed for Buildings 202 and 425 at the Avon Park Air Force Range. We are currently awaiting final paperwork and contract materials before formally submitting a draft of the final product for review by the Fort Worth U.S. Army Engineer District Office. I can tell you that the photographic documentation appears to be excellent and should provide an excellent permanent record of these resources.

If you have any questions, please call me at (972)423-5480.

Sincerely

A handwritten signature in blue ink that reads "Julian W. Adams".
Julian W. Adams
Sr. Architectural Historian



DEPARTMENT OF THE AIR FORCE
18th AIR SUPPORT OPERATIONS GROUP, DETACHMENT 1
AVON PARK AIR GROUND TRAINING COMPLEX (ACC)
MACDILL AIR FORCE BASE and AVON PARK AIR FORCE RANGE, FLORIDA

JUN 01 2005

MEMORANDUM FOR Mr. Scott Edwards
Historic Preservationist
Bureau of Historic Preservation
Division of Historical Resources
R.A. Gray Building, 4th Floor
500 South Bronough Street
Tallahassee, FL 32399-0250

FROM: 18 ASOG, DET 1, OL A/CEV
29 South Boulevard
Avon Park Air Force Range, FL 33825-5700

SUBJECT: Demolition of Buildings 202 and 425

1. In accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and *36 CFR Part 800: Protection of Historic Properties*, this letter is to notify the office of the State Historic Preservation Officer (SHPO) of the proposed demolition of Buildings 202 and 425 on Avon Park Air Force Range (APAFR). These structures have previously been determined by the SHPO to be eligible for listing in the National Register of Historic Places (NRHP). Due to their dilapidated condition, proposed demolition to these structures is necessary for the safety of APAFR personnel.
2. In response to your letter dated January 26, 2005, (DHR 2004-13285) APAFR has conducted a Historic American Building Survey (HABS) Level III to mitigate the adverse impacts of the proposed demolition of these structures. The HABS III photographic documentation was conducted in March 2005 by Betsy Barfield Photography, and the historic research was conducted from March 2005 to May 2005 by Geo-Marine Inc. (Attachment). The resultant report is currently being written by Geo-Marine, Inc. and will be submitted to the SHPO for review no later than 30 days after its completion.
3. APAFR is seeking concurrence with these determinations concerning the mitigation of the adverse impacts to buildings 202 and 425. Furthermore, APAFR is requesting that the SHPO allow the proposed demolition to continue with the stipulation that the aforementioned HABS III report be forwarded to the SHPO for review no later than 30 days after completion.
4. If you have any questions, please contact Ron Grayson at (863) 452-4119, ext 306, or by electronic mail at ronald.grayson@avonpark.macdill.af.mil.

FRANKLIN S. WALDEN, Lt Col, USAF
Commander

Attachment:
1. Geo-Marine, Inc. letter

FILE



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Colleen M. Castille
Secretary

June 28, 2005

Mr. Tod P. Zechiel
18 ASOG, DET 1, OL A/CEVN
29 South Boulevard
Avon Park AFR, FL 33825-5700

RE: Department of the Air Force – Draft Environmental Assessment for Demolishing
Buildings 202 and 425 at Avon Park Air Force Range – Polk County, Florida.
SAI # FL200506281223C

Dear Mr. Zechiel:

Florida State Clearinghouse staff, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has reviewed the referenced draft environmental assessment (DEA).

As noted in the DEA, the U.S. Air Force will be required to comply with the U.S. Environmental Protection Agency's National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos during building demolition activities. Please coordinate with the Department's Air Resources Management section in the Southwest District office in Tampa prior to beginning any demolition work. In addition, any other mitigation requirements identified by the Florida Department of State, Division of Historical Resources must be addressed prior to project implementation.

Based on the information contained in the DEA and compliance with the above NESHAP and *National Historic Preservation Act* requirements, the state has determined that the proposed federal action is consistent with the Florida Coastal Management Program.

Thank you for the opportunity to review the proposed project. If you have any questions regarding this letter, please contact Ms. Lauren P. Milligan at (850) 245-2170.

Sincerely,

Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/lm

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FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
 Secretary of State
 DIVISION OF HISTORICAL RESOURCES

Lt Col Franklin S. Walden
 Department of the Air Force
 18th Air Support Operations Group, DET 1/CC
 8707 North Golf Course Avenue
 MacDill Air Force Base, Florida 33621-5321

August 4, 2005

RE: DIIIR Project File Number: 2004-13285-C
 Additional Documentation Received by DHR August 3, 2005
 Historic American Building Survey Level III Documentation Package for the Demolition of
 Buildings 202 and 425
 Avon Park Air Force Range, Polk County

Dear Col Walden:

We have reviewed the additional photographic documentation for the above referenced Historic American Building Survey (HABS) documentation package submitted by your office for Buildings 202 and 425. It is the opinion of this agency that the documentation package is complete and sufficient in accordance with the Level III documentation of the HABS Standards.

We look forward to reviewing the archaeological monitoring report upon the demolition of Buildings 202 and 425. The archaeological monitoring report will complete the mitigation for this undertaking.

If you have any questions concerning our comments, please contact Scott Edwards, Historic Preservationist, by electronic mail sedwards@dos.state.fl.us, or at 850-245-6333 or 800-847-7278.

Sincerely,

Barbara C. Matteick
Deputy SHPO

for Frederick P. Gaske, Director, and
 State Historic Preservation Officer

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

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